

EXHIBIT 41

FILED AS CONFIDENTIAL

EXHIBIT 42

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EXHIBIT 43

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or is required by law;

6. Shall not impose personal opinions concerning politics of the District upon students (while the District recognizes and supports the First Amendment rights of its educators, they are not free to impose personal opinions concerning politics of the District upon students);
7. Shall uphold the honor and dignity of the profession in all actions and relations within the workplace.

ADMINISTRATORS

The administrator assumes responsibility for providing professional leadership in the school community. This responsibility requires the administrator to maintain the highest standards of professional conduct. The administrator's actions will be viewed and appraised by the community, professional associates, and students.

To these ends, in addition to the code of ethics for all employees and educators set forth above, the administrator:

1. Shall recognize that public schools are the public's business and seek to keep the public informed about their schools;
2. Shall support the principle of due process and protect the civil and human rights of all individuals;
3. Shall implement school board policies and administrative rules and regulations;
4. Shall pursue appropriate measures to correct those laws, policies, and regulations that are not consistent with sound educational goals.

SCHOOL BOARD MEMBERS

School board members shall recognize that, as members of a public school board, they are fulfilling a position of public trust, responsibility, and authority endowed by the State of Wyoming. In honoring the high responsibility which his/her membership demands, the school board member:

1. Shall remember that the first and greatest concern must be the educational welfare of all children in the District;
2. Shall bring about desired changes through legal and ethical procedures;

6. Shall not impose personal opinions concerning politics of the District upon students (while the District recognizes and supports the First Amendment rights of its educators, they are not free to impose personal opinions concerning politics of the District upon students);
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2. Shall bring about desired changes through legal and ethical procedures;

In fulfillment of his/her obligation, the educator:

1. Shall make the educational welfare of students the fundamental basis in all decision making and actions;
2. Shall make reasonable effort to protect the student from conditions harmful to learning or to health and safety;
3. Shall not intentionally expose the student to embarrassment or disparagement;
4. Shall not use relationships with students for private advantage;
5. Shall keep confidential information about students obtained in the course of professional service, unless disclosure serves a compelling professional purpose or is required by law;
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Section 23. SEXUAL HARASSMENT. Laramie County School District Number One strives to maintain a workplace that fosters mutual employee respect and promotes harmonious, productive working relationships. Our organization believes that discrimination, harassment, and/or retaliation in any form constitutes misconduct that undermines the integrity of the employment relationship. Therefore, Laramie County School District Number One prohibits discrimination and/or harassment that is sexual, racial, or religious in nature or is related to anyone's gender, national origin, age, sexual orientation, disability, or any other basis protected by federal, state, or local law. This policy applies to all employees throughout the organization and to all individuals who may have contact with any employee of this organization. Furthermore, Laramie County School District Number One will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship, health, or safety concern.

The District will promptly and carefully investigate all complaints of sexual harassment. An individual filing a complaint is requested to complete Exhibit 37, Personnel Sexual Harassment Report. All complaints, both written and verbal will be investigated regardless of completing Exhibit 37. Every reasonable effort will be made to determine the merits of each complaint while protecting the interests and well-being of both the accuser and the accused.

The District will act forthrightly to discipline, or dismiss as appropriate, considering the seriousness of the offense, any employee who has been found to sexually harass a student or another employee of the District, or any employee making a false or malicious complaint of sexual harassment. The prohibition against sexual harassment applies whether the harassment is between people of the same or different gender.

Unwelcome sexual advances, requests for sexual favors, or other verbal, visual, or physical conduct of a harassing and/or discriminatory nature will constitute harassment and/or discrimination when the person involved feels compelled to submit to that misconduct in order to keep his/her position, to receive appropriate pay, or to benefit from certain employment decisions. If this type of misconduct interferes with an employee's work or creates an intimidating, hostile, or offensive work environment, it also may be considered harassment and/or discrimination. This behavior can include but is not limited to suggestive or insulting noises, facial expressions, vulgar language, nicknames, slurs, derogatory comments, cartoons, jokes, written materials, emails, "sexting", social networking, Facebook, or Twittering and offensive gestures or touching.

DEFINITION

Sexual harassment is a form of sex discrimination which violates Section 703 of Title VII and Title IX of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e, et seq. and the Wyoming Fair Employment Practices Act of 1965. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, sexual jokes, sexual graffiti, or other verbal or physical conduct of a sexual nature which:

1. is made an employment condition so that submission to such conduct is a term or condition of employment;
2. is an employment consequence, so that submission to or rejection of such conduct is used as a basis for employment decisions affecting an individual employee;
3. is an offensive job interference, so that such conduct has the purpose or effect of reasonably interfering with an employee's work performance or creating an intimidating, hostile, or offensive work environment;
4. is made a condition such that a student believes that submission to such conduct is required to participate in a school program or activity;
5. causes a student to believe that an employee will make an educational decision about the student based on whether the student submits to the unwelcome sexual conduct;
6. is so severe, persistent, pervasive, or deliberate as to create an intimidating, persistent, hostile, or offensive educational environment.
7. Sexual harassment may include, but is not limited to: verbal harassment, including epithets, derogatory comments or slurs, sexual jokes, sexual graffiti, physical harassment, physical interference with movement or work, or visual harassment such as derogatory cartoons, drawings, or posters.

Laramie County School District Number One expects that everyone will act responsibly to establish a pleasant and friendly work environment. However, if an employee feels he/she has been subjected to any form of harassment and/or discrimination, the employee should report that conduct to his/her immediate supervisor, another member of management, or the Assistant Superintendent of Human Resources within three calendar days of the offense. Employees are not required to approach the person who is harassing and/or discriminating against them, and they may bypass any offending member of management. The person the harassment or discrimination is reported to will take the necessary steps to initiate an investigation of the discrimination and/or harassment claim.

Laramie County School District Number One will conduct its investigation in a confidential manner as is possible. Interviews, allegations, statements, and identities will be kept confidential to the extent possible and allowed by law. However, Laramie County School District Number One will not allow the goal of confidentiality to be a deterrent to an effective investigation. A timely resolution of each complaint will be reached and communicated to the employee. Appropriate corrective action, up to and including termination, will be taken promptly against any employee engaging in discrimination and/or harassment. The corrective action issued will be proportional to the severity of the conduct. The alleged harasser's employment history and any similar complaints of prior unlawful discrimination and/or harassment will be taken into consideration.

Laramie County School District Number One prohibits retaliation of any kind against employees, who, in good faith, report harassment and/or discrimination or assist in investigating such complaints. If an employee feels he/she has been subjected to any form of retaliation, the employee should report that conduct to his/her immediate supervisor, another member of management, or the Assistant Superintendent of Human Resources within three calendar days of the offense. Employees are not required to approach the person who is retaliating against them, and they may bypass any offending member of management.

OUTSIDE CONTRACTORS

The District will take similar measures through the actual employer of contractors whose employees have been reported for sexual harassment. If the contractor is not responsive in investigating and resolving the matter, the District will prohibit the offending employee(s) from any involvement with the District, or may choose to terminate the contract.

Adopted 7/11/88
 Revised 7/8/91 & 8/1/97
 Revised 7/10/00
 Revised 6/21/04
 Revised 6/20/11

EXHIBIT 46

Section 23. SEXUAL HARASSMENT/DISCRIMINATION. Laramie County School District Number One strives to maintain a workplace that fosters mutual employee respect and promotes harmonious, productive working relationships. Our organization believes that discrimination, harassment, and/or retaliation in any form constitutes misconduct that undermines the integrity of the employment relationship. Therefore, Laramie County School District Number One prohibits discrimination and/or harassment that is sexual, racial, or religious in nature or is related to anyone's gender, national origin, age, sexual orientation, disability, or any other basis protected by federal, state, or local law. This policy applies to all employees throughout the organization and to all individuals who may have contact with any employee. Furthermore, Laramie County School District Number One will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship, health, or safety concern.

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Laramie County School District Number One will conduct its investigation in a confidential manner

Section 23. SEXUAL HARASSMENT/DISCRIMINATION. Laramie County School District

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EXHIBIT 47

Meza Personnel file excerpts

FILED AS CONFIDENTIAL

Employee Handbook



***Laramie County School
District
Number One
2810 House Avenue
Cheyenne, Wyoming 82001***

August 2014

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MISSION STATEMENT

The mission of Laramie County School District Number One, in cooperation with students, parents, staff and the community, is to guarantee a high quality education in a safe and orderly environment for all students, inspiring them to become life-long learners and responsible, productive citizens.

(Board Policy Manual p.3)



John Lyttle
Superintendent of Schools (307) 771-2121
2810 House Avenue, Room 130 • Cheyenne, Wyoming 82001

August 2014

Dear Employees:

On behalf of the School Board and the School District, it is my sincere pleasure to welcome you to Laramie County School District Number One's 2014-2015 school year. Our school district's mission, "In cooperation with students, parents, staff and the community, is to guarantee a high quality education in a safe and orderly environment for all students, inspiring them to become life-long learners and responsible, productive citizens."

We have made great strides in ensuring that each of our students are receiving a high quality education. Your expertise, commitment and enthusiasm will make the difference with our continued growth. I thank you for being a part of a collaborative team that contributes to a school system where we are successfully engaging every student in learning.

This handbook will assist you in gaining information about Laramie County School District Number One and provide you with answers to some questions you may have about the District. You will find references to local, state, and federal employment practices, Board policies, benefits, and procedures to access resources of the District.

Many of the employment practices and procedures contained in this handbook are selected from Laramie County School District Number One Board of Trustees policies. A complete Board of Trustees policy manual is available in each school and at the Superintendent's office in the District Administration Building. Individual employee negotiated agreements are available in Human Resources in the District Administration Building.

Again, thank you for your commitment to our District and making a positive difference with students, parents, and community members.

Respectfully,

John Lyttle

Superintendent of Schools



The state of Wyoming provides Hathaway Merit and Needs-based Scholarships to Wyoming students attending the University of Wyoming and Wyoming Community Colleges. Every student who meets the merit requirements can earn a Hathaway Merit Scholarship. Contact your school counselor for more information.

LARAMIE COUNTY SCHOOL DISTRICT NUMBER ONE
Cheyenne, Wyoming

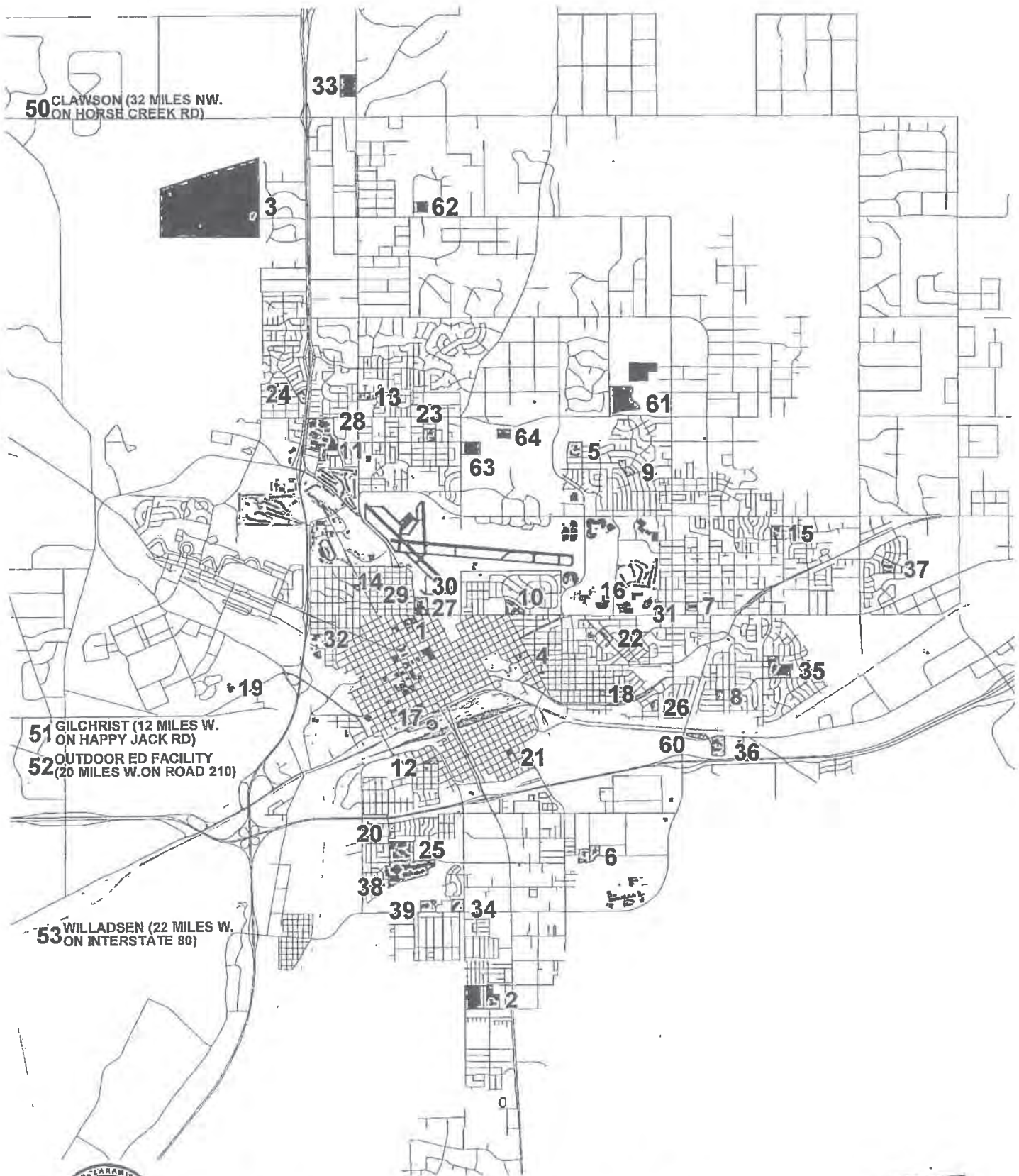
BOARD OF TRUSTEES

Hank Bailey, Chairman
Sandy Shanor, Vice Chairman
Tim Bolin, Treasurer
Lynn Storey Huylar, Assistant Treasurer
Anne Beckle, Clerk
Nate Breen, Assistant Clerk
Mark Klaassen, Trustee
David Evans, Board Attorney

ADMINISTRATIVE STAFF

John Lyttle, Superintendent of Schools
Tracey Kinney, Assistant Superintendent of Instruction
W. Matt Strannigan, Assistant Superintendent of Human Resources
Dave Bartlett, Assistant Superintendent of Support Operations
Marc LaHiff, Director of Instruction
Alice Hunter, Director of Special Services
Gordon Knopp, Director of Technology
Brent Young, Assistant Director of School Improvement/Assessment Facilitator/At Risk
J. P. Denning, Assistant Director of Special Services

August 2014



Cheyenne Area Map

Laramie County School District One



LARAMIE COUNTY SCHOOL DISTRICT NUMBER ONE***Employee Handbook***

Training records will be maintained in the Risk Management Office. All employee records shall be made available to the employee, the Assistant Secretary of Labor for the Occupational Safety and Health Administration upon request. These records cannot be transferred to another facility (*Reference Board Policy Manual - pg. 223*)

COMPLAINTS CONCERNING DISTRICT PERSONNEL

The Board believes that complaints and grievances are best dealt with and resolved as close to the origin as possible and that the professional staff should be given every opportunity to consider the issues and render decisions prior to the involvement of the Board.

Constructive criticism of District employees will be welcomed as a means toward improving the performance of employees. The Board however places trust in its employees and will protect them as far as possible from unwarranted criticisms and complaints. Employees shall be informed of the nature and source of any complaints against them under this policy. Anonymous complaints will not be used as a basis for initiating this policy. Complaints concerning District employees may originate from parents, employees, or from community groups and organizations. (*Reference Board Policy Manual - pg. 202*)

CRIMINAL HISTORY BACKGROUND CHECKS

All employees initially hired by the District on or after July 1, 1996, who may have access to minors, must submit to fingerprinting for the purpose of obtaining state or national criminal history record information before employment. First time certified individuals will be checked through the Professional Teaching Standards Board. Beginning July 1, 1996, and thereafter, any person offered employment with the District as a classified employee will be given applicant fingerprint cards provided by Laramie County School District One Human Resource Department. Payroll technicians will be responsible for making arrangements with the Division of Criminal Investigation to have the respective employee's fingerprints taken. Fingerprinting will be scheduled prior to the employee reporting to work. Each prospective employee shall also complete, sign, and have notarized, the waiver form contained on the reverse side of the fingerprint card. All completed fingerprint cards and waiver forms shall be left with the Office of Criminal Investigation at the time of fingerprinting.

The Assistant Superintendent of Human Resources is designated as the person to receive and maintain all information received by the District related to criminal history checks on applicants and employees. All information obtained by the District pursuant to the criminal history check shall remain confidential. The criminal history information shall be returned to the Assistant Superintendent of Human Resources and access of the information shall be restricted to the Assistant Superintendent or designee. The information shall be maintained in separate files for each applicant in a locked file cabinet in the Human Resources Office. The District shall not divulge the information obtained from the criminal history check unless required to do so by any federal or state agency.

In the event the Assistant Superintendent of Human Resources receives criminal history information on an applicant which disqualifies the applicant for employment with the District, the Assistant Superintendent of Human Resources shall notify the applicant personally or in writing (certified mail, return receipt requested) of their disqualification. If the Board dismisses or accepts the resignation of a person holding certification, the Board shall notify the Professional Teaching Standards Board of the dismissal or resignation, if the dismissal or resignation was based in whole or in part, on the person's conviction of a felony.

The District may deny employment to any person seeking employment who has been convicted of a felony and may dismiss an employee who has misrepresented his/her criminal history. The District may deny employment to any person convicted of any criminal act involving drugs, alcohol, weapons, and/or violence. The District shall pay all costs incurred for obtaining the fingerprinting and processing the

LARAMIE COUNTY SCHOOL DISTRICT NUMBER ONE***Employee Handbook***

environment that stimulates the spirit of inquiry, the acquisition of knowledge and understanding, and the thoughtful formulation of worthy goals.

An effective educational environment requires the services of men and women of integrity, high ideals, and human understanding. To maintain and promote these essentials, it is the policy of Laramie County School District Number One that the Board of Trustees and all staff members maintain high standards in their relationships with students, colleagues, and community members; and act as role models in the performance of their professional duties. See Administrative Registration – Wyoming Professional Conduct Guide from the Wyoming Professional Teaching Standards Board (PTSB).

The components of this statement of ethical conduct are not intended as inflexible or unchangeable rules. They serve to measure the propriety of each staff member in their working relationships. They are intended to encourage and emphasize the positive attitudes and behaviors of professional conduct in all matters. This policy in no way is intended to abridge employees' rights as citizens. The District recognizes and supports the First Amendment rights of school district employees to comment upon matters of public concern. These First Amendment rights must be balanced with the legitimate and substantial interest of school districts, however, in operating effective and efficient schools.

Professional Conduct Guide

Laramie County School District Number One adopts the current Wyoming Professional Teaching Standards Board (PTSB) Professional Conduct Guide as a n Administrative Regulation with the expectation that all employees adhere to the conduct guide. Conduct Guide used with permission from PTSB.

DISTRICT EMPLOYEES

All individuals who serve as employees of Laramie County School District Number One should do so with integrity. Impropriety should not occur. To this end, employees of Laramie County School District Number One:

1. Shall obey local, state, and national laws;
2. Shall adhere to school board policies and administrative rules, regulations, and established standards for work and performance;
3. Shall protect and conserve all property owned, held by, or leased to the District;
4. Shall not use his/her position for personal gain;
5. Shall refrain from acting on any matter or letting any contracts in which the employee or his/her immediate family or business associates stand to gain a pecuniary benefit as defined by W.S. Section 6-5-101;
6. Shall refrain from conducting personal business during business hours;
7. Shall not accept any pecuniary benefits as defined by W.S. Section 6-5-101 in circumstances that would create the appearance of a conflict of interest;
8. Shall not accept outside employment or any other outside activity which interferes with the full and proper discharge of the employee's duties and responsibilities to the District, except as allowed by Board policy, Chapter VI, Section 7;
9. Shall not knowingly make a false, malicious, threatening, or harassing statement to or about District employees, students, or parents;
10. Shall strive to resolve all problems at the lowest possible level, and attempt to resolve problems with another employee privately before involving others in a dispute.

EDUCATORS

The educator strives to help each student realize his/her potential as a worthy and effective member of society. Therefore, the educator works to stimulate the spirit of inquiry, the acquisition of knowledge and understanding, and the thoughtful formulation of worthy goals. In fulfillment of his/her obligation, the educator:

1. Shall make the educational welfare of students the fundamental basis in all decision making and actions;
2. Shall make reasonable effort to protect the student from conditions harmful to learning or to health and safety;

LARAMIE COUNTY SCHOOL DISTRICT NUMBER ONE**Employee Handbook****EVALUATION OF PERSONNEL**

Evaluations of District personnel place emphasis on school results, ethical conduct and on the accomplishment of District goals and objectives. District personnel shall be evaluated by their immediate supervisor using approved evaluation instruments. Remediation procedures and techniques may be used as needed for all employees. Remediation procedures and techniques are outlined more specifically in the Laramie County School District Number One Employee Evaluation Manual and in the Negotiated Agreements between the recognized representatives of each unit and the Board of Trustees.

ADMINISTRATORS

New administrators shall be evaluated at least twice each year during the first two years. All other administrators shall be evaluated annually.

TEACHERS

Initial contract teachers shall be evaluated at least twice each year of their three-year probation period. Continuing contract teachers shall be evaluated annually.

Remediation procedures and techniques may be used as needed for both initial contract and continuing contract teachers.

CLASSIFIED STAFF

Each classified employee of the District shall be evaluated at least annually.

RECORD KEEPING

All personnel evaluations and reports shall be placed in each employee's permanent personnel file maintained in the office of the Assistant Superintendent of Human Resources. It shall be the responsibility of the building administrator or supervisor to forward a copy of evaluation reports from his working file to the employee's permanent file.

Before any evaluation is placed in an employee's permanent file, each employee shall have an opportunity to review and sign the report. The employee shall have ten working days in which to make any written response. Responses shall be included in the permanent personnel file. If an employee refuses to sign an evaluation report, this shall be noted in the evaluation. (*Reference Board Policy Manual - pg. 174*)

PERSONNEL RECORDS

A comprehensive and efficient system of secured personnel records shall be maintained in the office of the Assistant Superintendent of Human Resources. A personnel folder for each employee, certificated and classified, shall be accurately maintained in that office. An electronic copy of each employee's personnel record shall be maintained by Human Resources. Employees of Laramie County School District Number one shall be entered into the current District payroll database using their full legal name. The District payroll database shall be the authoritative source of employee information for all District databases. It is the responsibility of the employee to promptly inform Human Resources of any employee information changes.

All personnel records of individual employees shall be considered confidential. They shall not be released for public inspection.

LARAMIE COUNTY SCHOOL DISTRICT NUMBER ONE

Employee Handbook

District employees' names and addresses shall be released only as required by the Freedom of Information Act. Information of a "directory" nature shall be released only as approved by the Board.

In addition to the application for employment and references, the folders shall contain records and information regarding compensation, payroll deductions, evaluations, and other information considered pertinent by the Assistant Superintendent of Human Resources.

Evaluations, correspondence, or other material received after initial employment making reference to an employee's competence or character shall not be placed in the personnel file of an individual without first requesting the employee to sign the document. If the employee refuses to sign the document, it shall be placed in the employee's personnel file, provided the supervisor/administrator notes the employee's opportunity to sign. After the employee receives the documents, they will have ten calendar days to attach comments.

Record of any grievance procedure(s) shall be maintained separately from an employee's permanent personnel file.

Each employee shall have the right, upon written request to the Assistant Superintendent of Human Resources to review the contents of his own file, with the exception of pre-employment reference recommendations. The review shall be conducted in the presence of the Assistant Superintendent of Human Resources or designee.

Classified employees shall have the right to petition for removal of documents from their personnel files as specified in negotiated agreements between their recognized representatives and the Board. (***Reference Board Policy Manual - pg. 219***)

Civil No. 20-CV-00053-ABJ

3. The attorneys for LCSD No. 1 prepared, for my dissemination, a directive to all secondary school principals in LCSD No. 1, and to the Assistant Superintendent of Human Resources and the Title IX Coordinator, to undertake the additional required review. A copy of the directive is attached to this affidavit as Exhibit A.

4. Accordingly, on March 25, 2021, I sent the directive via e-mail to all secondary school principals in LCSD No. 1, to the Assistant Superintendent of Human Resources and the Title IX Coordinator and requested that they respond directly to the attorneys for LCSD No. 1.

5. I am informed by the attorneys for LCSD No. 1 that all recipients of the directive responded and provided the requested information to the extent they had responsive information.

FURTHER AFFIANT SAYETH NOT.


Boyd Brown

STATE OF WYOMING)
)SS.
COUNTY OF LARAMIE)

The above and foregoing Affidavit of Boyd Brown was subscribed, sworn to and acknowledged before me by Boyd Brown this 21 day of April, 2021.

Witness my hand and official seal.




Notary Public

My Commission Expires: 9-12-2022

CERTIFICATE OF SERVICE

I hereby certify that on the 22 day of April, 2021, a true and correct copy of the foregoing **AFFIDAVIT OF BOYD BROWN** was served via email to:

Melinda S. McCorkle – melinda@kimplaw.net
McCORKLE LAW
P.O. Box 1926
Cheyenne, WY 82003-1926
erin@kimplaw.net

Anna Reeves Olson - aro@parkstreetlaw.com
PARK STREET LAW OFFICE
242 So. Park Street
Casper, WY 82601
kate@parkstreetlaw.com



Hickey & Evans, LLP

TO ALL PRINCIPALS OF ALL SECONDARY SCHOOLS IN LCSD NO. 1, THE
ASSISTANT SUPERINTENDENT FOR HUMAN RESOURCES AND THE TITLE IX
COORDINATOR

Laramie County School District No. 1 is a defendant in a lawsuit brought by former student Gracie Forth arising from an improper sexual relationship which occurred between her and former teacher Joseph Meza. In the course of the lawsuit, Ms. Forth's attorneys are allowed to inquire as to the District's handling of other incidents of teacher-student or student-student sexual abuse, harassment and/or discrimination.

LCSD No. 1, in working with its attorneys, has attempted to identify such incidents and it is believed that an accurate accounting for the same has been provided to the attorneys for Ms. Forth. At the impetus of the attorneys for Ms. Forth, however, a hearing was recently held and the Court ordered the District to engage in a further review to insure that all such incidents or complaints of such sexual abuse, harassment or discrimination have been identified and disclosed.

Accordingly, the District is requesting that the principals of all secondary schools in the District, the Assistant Superintendent for Human Resources and the Title IX Coordinator conduct the following further review and inquiry:

1. For the period from January 1, 2012 through July 31, 2017, please identify all formal and informal complaints or reports by any person, whether oral or written, made to any assistant principal, principal, assistant superintendent, superintendent, supervisor, member of human resources, or Title IX coordinator of LCSD #1, alleging harassment or discrimination of a student, including student-on-student harassment/discrimination and teacher-on-student harassment/discrimination. For each identified complaint or report, please state:

1. The date of the complaint;
2. The alleged grounds of the complaint;
3. The person to whom the complaint was made;
4. Whether any action was taken based upon the complaint;
5. The outcome of the complaint; and
6. Whether the complaint and/or conduct that formed the basis for the complaint was reported to the Office of Civil Rights.

2 For the period from January 1, 2012 to July 31, 2017, please identify all incidents of alleged harassment, discrimination, or sexual abuse of a student by an LCSD #1 employee of which LCSD #1 is aware or received notice of, regardless of the source of the information. For each identified complaint or report, please state:



1. The date(s) of the alleged harassment, discrimination, or sexual abuse;
2. The alleged grounds of the alleged harassment, discrimination or sexual abuse;
3. The way in which LCSD #1 was notified and/or became aware of the alleged harassment, discrimination, or sexual abuse;
4. Whether the District took any action based upon the alleged harassment, discrimination or sexual abuse;
5. The outcome of the action taken by the District, if any; and
6. Whether the conduct was reported to the Office of Civil Rights.

You will note that item number one focuses on “complaints” while item two focuses on “incidents,” whether or not a complaint was made. These inquiries do not encompass minor isolated incidents such as students making inappropriate sexual comments to each other or minor incidents of improper touching. What the inquiries are focused upon are incidents of serious sexual abuse and harassment, such as grooming behavior, improper relationships between a LCSD #1 employee and a student, etc.

If you identify any incidents or complaints responsive to the above, please also provide any documents reflecting the same, such as incident reports, complaints, reprimands, notes in personnel files or site files, etc.

For building principals, the inquiry requires that you locate and review any files in your building that would contain such information, such as site files.

Due to deadlines imposed by the Court, we ask that you complete the above review no later than April 9 and you provide any information and documents obtained to Loyd Smith or John Coppede by that date.

If you have any questions, please contact the District’s attorneys John Coppede or Loyd Smith at Hickey & Evans, LLC, telephone number (307) 634-1525.

EXHIBIT 50

John A. Coppede, Esq. (5-2485)
 Loyd E. Smith, Esq. (5-2509)
 HICKEY & EVANS, LLP
 1800 Carey Ave, Ste 700
 PO Box 467
 Cheyenne, WY 82003-0467
 Ph: (307) 634-1525
 Fx: (307) 638-7335
 jcoppede@hickeyevans.com
 lsmith@hickeyevans.com
Attorneys for Defendant
Laramie County School District No. 1

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING

GRACIE ANN FORTH,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 20-CV-00053-ABJ
)	
LARAMIE COUNTY SCHOOL DISTRICT)	
No. 1 and John/Jane Does 1-10 in his/her)	
official capacity,)	
)	
Defendants.)	

**DEFENDANT LARAMIE COUNTY SCHOOL DISTRICT NO. 1'S ANSWERS TO
 PLAINTIFF'S THIRD SET OF INTERROGATORIES**

Defendant, Laramie County School District No. 1 (the "District"), pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby answers Plaintiff's Third Set of Interrogatories to Defendant Laramie County School District No. 1 as follows:

INTERROGATORY NO. 13: For the period from January 1, 2012 to present, please identify all incidents of alleged harassment, discrimination, or sexual abuse of a student by an LCSD #1 employee of which LCSD #1 is aware or received notice of, regardless of the source of the information. For each identified complaint or report, please state:

1. The date(s) of the alleged harassment, discrimination, or sexual abuse;
2. The alleged grounds of the alleged harassment, discrimination or sexual abuse;
3. The way in which LCSD #1 was notified and/or became aware of the alleged harassment, discrimination, or sexual abuse;
4. Whether the District took any action based upon the alleged harassment, discrimination or sexual abuse;
5. The outcome of the action taken by the District, if any; and
6. Whether the conduct was reported to the Office of Civil Rights.

Note: This Interrogatory does not seek the divulgence of information protected by FERPA. It does not seek the name(s) of the students involved in the alleged harassment/discrimination. To the extent that the grounds of the complaint pose a legitimate risk that the student may be identified, please provide non-identifying information about the grounds of the complaint and answer the remaining portions of the Interrogatory.

ANSWER:

The District objects to this Interrogatory because it is overbroad, unduly burdensome, not relevant to the claims or defenses of the parties and not proportional to the needs of this case, taking into consideration the importance of the issues at stake in this action, the amount in controversy, the importance of the discovery in resolving the issues and because the burden or expense of the proposed discovery outweighs its likely benefit. The District also objects to this Interrogatory because it seeks information that should be deemed confidential and not subject to a general discovery request. The District also objects to this Interrogatory to the extent disclosure of this information is prohibited by the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g and 34 C.F.R. § 99, et al.

The District further objects to this interrogatory to the extent it seeks information regarding incidents of harassment or discrimination occurring after Joseph Meza's arrest in 2017 as irrelevant to the claims in this lawsuit. Notwithstanding and without waiving the foregoing objection, the District provides the following information.

1. INCIDENT NO. 1

1. The date(s) of the alleged harassment, discrimination, or sexual abuse: **Answer:** Per the Second Amended Information filed by the Laramie County District Attorney, the dates were October 2012 to March 12, 2014.
2. The alleged grounds of the alleged harassment, discrimination or sexual abuse: **Answer:** A teacher became sexually involved with a student.
3. The way in which LCSD #1 was notified and/or became aware of the alleged harassment, discrimination, or sexual abuse. **Answer:** The District became aware of the matter upon the arrest of the teacher.
4. Whether the District took any action based upon the alleged harassment, discrimination or sexual abuse. **Answer:** The teacher was immediately suspended from employment, followed by the District's recommendation of termination. The teacher thereafter terminated her employment.
5. The outcome of the action taken by the District, if any. **Answer:** The District issued a recommendation of termination and the teacher thereafter terminated her employment with the District.
6. Whether the conduct was reported to the Office of Civil Rights. **Answer:** Not reported.

2. INCIDENT NO. 2

1. The date(s) of the alleged harassment, discrimination, or sexual abuse: **Answer:** November 19, 2019.
2. The alleged grounds of the alleged harassment, discrimination or sexual abuse: **Answer:** PE Teacher pulled down the pants and exposed the undergarments of a disabled student.
3. The way in which LCSD #1 was notified and/or became aware of the alleged harassment, discrimination, or sexual abuse. **Answer:** Reported by eyewitnesses.
4. Whether the District took any action based upon the alleged harassment, discrimination or sexual abuse: **Answer:** District undertook a Title IX investigation and undertook disciplinary/termination proceedings.
5. The outcome of the action taken by the District, if any: **Answer:** The teacher resigned prior to termination.
6. Whether the conduct was reported to the Office of Civil Rights. **Answer:** Not reported.

3. INCIDENT NO. 3

This incident was mentioned during the deposition of Boyd Brown.

1. The date(s) of the alleged harassment, discrimination, or sexual abuse: **Answer:** November, 2020.

2. The alleged grounds of the alleged harassment, discrimination or sexual abuse:

Answer: A District employee sent an explicit video by text to a student. The employee states this was an accident.

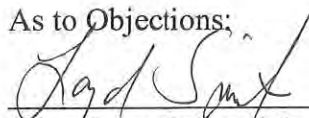
3. The way in which LCSD #1 was notified and/or became aware of the alleged harassment, discrimination, or sexual abuse. **Answer:** The student's mother notified a school principal.

4. Whether the District took any action based upon the alleged harassment, discrimination or sexual abuse. **Answer:** The District undertook an investigation which is nearly complete.

5. The outcome of the action taken by the District, if any. **Answer:** The District is proceeding with termination of the District employee.

6. Whether the conduct was reported to the Office of Civil Rights. **Answer:** Not reported.

As to Objections:



John Coppede/Loyd Smith

VERIFICATION

I, Boyd Brown, Superintendent of Laramie County School District No. 1, hereby certify that upon information and belief the foregoing interrogatory answers are true and accurate to the best of my knowledge and belief.

DATED this 21 day of January 2021.




Boyd Brown, Superintendent
Laramie County School District No. 1

STATE OF WYOMING)
) ss.
COUNTY OF LARAMIE)

Signed and sworn to before me on the 21 day of January 2021, by Boyd Brown, as the Superintendent of Laramie County School District No. 1.

Witness my hand and official seal.


Notary Public

My Commission Expires: 9-12-2022

Dated this 21 day of January, 2021.

Laramie County School District No. 1
Defendant



John A. Coppede (#5-2485)

Loyd E. Smith, Esq. (#5-2509)

HICKEY & EVANS, LLP

1800 Carey Avenue, Suite 700

P.O. Box 467

Cheyenne, WY 82003

Ph: (307) 634-1525

Fx: (307) 638-7335

jcoppede@hickeyevans.com

lsmith@hickeyevans.com

CERTIFICATE OF SERVICE

I hereby certify that on the 21 day of January, 2021, a true and correct copy of the foregoing **DEFENDANT LARAMIE COUNTY SCHOOL DISTRICT NO. 1'S ANSWERS TO PLAINTIFF'S THIRD SET OF INTERROGATORIES TO DEFENDANT LARAMIE COUNTY SCHOOL DISTRICT NO. 1** was served via email and U.S. mail, first class postage prepaid to:

Melinda S. McCorkle – melinda@kemplaw.net

McCORKLE LAW

P.O. Box 1926

1720 Carey Avenue, Suite 600

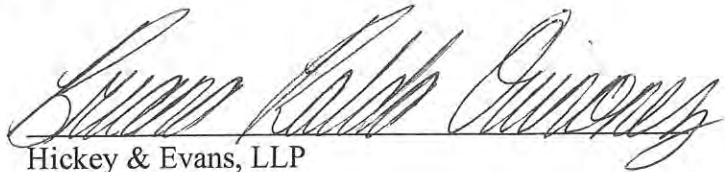
Cheyenne, WY 82003-1926

Anna Reeves Olson - aro@parkstreetlaw.com

PARK STREET LAW OFFICE

242 So. Park Street

Casper, WY 82601



Hickey & Evans, LLP

EXHIBIT 51

FILED AS CONFIDENTIAL